

JUL 19 1989

For Six Month Period Ending _____
(Insert date)

Name of Registrant

Registration No. 1648 *dy*

Sontheimer Hazlett, Ltd. also D/B/A Sontheimer Group, also through
Mallory Factor Inc. St. Maarten Tourist Info. office & Bonaire Tourist
Business Address of Registrant Bureau.
275 Seventh Avenue
New York, NY 10001

I—REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☐ N/A

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Registrant is engaged as P/R's counsel in the United States for the purpose of promoting tourism on the islands of St. Maarten, Saba St. Eustasius & Bonaire.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government, a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Amortized over Six month period	Gov't of Island Territory the Windward section St. Maarten	Payment for NY office suits for tourism & svces. rendered on behalf of the tourism office	\$104,260
Amortized over six month period	Bonaire Gov't	Same as above	\$ 91,000
Total			\$195,260

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal. Gov't of Island Territory, Windward Island section of St. Maarten & Bonaire.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
	See schedule I (attached)		

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: N/A

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: N/A

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☐ English ☐ Other (specify) _____
N/A

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? N/A Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? N/A Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐
Exhibit B⁷ Yes ☐ No ☐ N/A

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

If you have previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature).

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Yvonne Nichie

Yvonne Nichie

Subscribed and sworn to before me at 275 Seventh Avenue NY, NY 10001

this 18th day of August, 19 89

LORI SILBERGER
Notary Public, State of New York
No. 4974000
Qualified in Nassau County 4/90
Commission Expires _____

Lori Silber

(Signature of notary or other officer)

¹The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

PR Project

DATE	VENDOR	PURPOSE	AMOUNT
01/25/89	Burrells Press	PR	212.73
01/25/89	Copycare Printing	PR	421.20
01/25/89	DHL Airways Inc.	PR	100.25
01/25/89	Federal Express	PR	14.00
01/25/89	Joe Fox	PR	1,700.00
01/25/89	Luce Press Clipping	PR	461.37
01/25/89	Manhattan Couriers	PR	84.75
01/25/89	John Salayi Mech.	PR	150.00
01/25/89	UPS	PR	178.88
02/01/89	Copycare Printing	PR	185.49
02/01/89	UPS	PR	29.20
02/08/89	Brody & Weiss	PR	350.00
02/08/89	Manhattan Couriers	PR	25.00
02/08/89	Technisphere Corp.	PR	193.77
02/08/89	UPS	PR	84.13
02/14/89	Gail B. Knopfler	PR	1,000.00
02/15/89	Federal Express	PR	68.00
02/15/89	Consolidated Freight	PR	229.64
02/15/89	Manhattan Couriers	PR	17.25
02/15/89	The NY Times	PR	288.50
02/15/89	UPS	PR	17.06
02/16/89	National Flag	PR	165.08
02/16/89	Sarah Davis	PR	488.10
02/22/89	DHL	PR	46.50
02/22/89	Federal Express Co.	PR	14.00
02/22/89	Manhattan Couriers	PR	10.75
02/24/89	Landmark	PR	280.00
03/01/89	MM Bank	PR	1,000.00
03/01/89	Star Impressions	PR	44.28
03/01/89	Federal Express	PR	38.00
03/01/89	DHL Airways Inc.	PR	113.50
03/01/89	MHT	PR	300.00
03/10/89	Federal Express	PR	35.00
03/10/89	Luce Press Clipping	PR	368.88
03/10/89	Manhattan Couriers	PR	16.50
03/10/89	Travelview Int'l	PR	401.50
03/10/89	UPS	PR	31.79
03/10/89	Western Union	PR	27.81
03/17/89	Gail Knopfler	PR	500.00
03/17/89	City Collector	PR	730.62
03/17/89	Burrells Press Clip	PR	221.13
03/17/89	SABRA Car & Limo	PR	62.30
03/17/89	Summit Office Supl.	PR	11.37
03/17/89	UPS	PR	113.16
03/17/89	Western Union	PR	39.81
03/30/89	Federal Express	PR	32.00

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PR Project

03/30/89 Copycare Printing	PR	1,167.26
03/30/89 DHL Airways Inc.	PR	223.55
03/30/89 KMP	PR	358.00
03/30/89 Manhattan Courier	PR	28.25
03/30/89 UPS	PR	38.30
04/05/89 Brody & Weiss	PR	350.00
04/05/89 Burrelles Press Clip	PR	234.38
04/05/89 Federal Express Co.	PR	369.00
04/05/89 J.P. Egan	PR	151.55
04/05/89 MM Bank	PR	1,000.00
04/05/89 SABRA Car & Limo	PR	28.40
04/05/89 SAMA	PR	1,000.00
04/05/89 Star Impressions	PR	88.56
04/05/89 Travel New Bureau	PR	25.00
04/05/89 UPS	PR	26.16
04/12/89 Sarah Davis	PR	150.00
04/12/89 UPS	PR	20.78
04/12/89 Framers' Workroom	PR	142.35
04/12/89 IRS	PR	2,096.00
04/19/89 Bonnaire Car Rental	PR	440.98
04/19/89 Divi Hotels	PR	22.00
04/19/89 Federal Express Co.	PR	105.50
04/19/89 Manhattan Couriers	PR	5.75
04/19/89 The NY Times	PR	179.50
04/19/89 Olympic Courier	PR	33.50
04/19/89 Technisphere Corp.	PR	28.96
04/19/89 UPS	PR	70.97
04/19/89 Western Union	PR	39.81
04/19/89 Postmaster	PR	1,500.00
04/26/89 NYC Dept of Fin.	PR	858.77
04/27/89 UPS	PR	8.58
05/03/89 Admors Officeworld	PR	9.41
05/03/89 Federal Express	PR	592.00
05/03/89 Copycare Printing	PR	224.50
05/03/89 MM Bank	PR	1,100.00
05/09/89 Proprint	PR	35.00
05/09/89 American Airlines	PR	43.79
05/09/89 Brody & Weiss	PR	350.00
05/09/89 DHL Airways Inc.	PR	45.25
05/09/89 KMP	PR	20.50
05/09/89 Luce Press Clipping	PR	459.45
05/09/89 John Salayi	PR	120.00
05/09/89 Public Relations	PR	105.00
05/09/89 Summit Office Supl.	PR	103.05
05/17/89 Bonnaire Scuba Ctr.	PR	700.00
05/17/89 Orpheus Visions	PR	50.00
05/17/89 Gail Knopfler	PR	544.26
05/18/89 Copycare Printing	PR	541.36

PR Project

05/18/89 Manhattan Couriers	PR	54.00
05/24/89 DHL Airways Inc.	PR	8.75
05/24/89 Federal Express Co.	PR	163.25
05/24/89 Manhattan Courier	PR	17.25
05/24/89 UPS	PR	659.07
05/31/89 DHL Airways Inc.	PR	38.00
05/31/89 KMP	PR	137.40
05/31/89 Manhattan Couriers	PR	10.50
05/31/89 UPS	PR	40.04
06/05/89 UPS	PR	179.93
06/05/89 UPS	PR	157.41
06/05/89 MM Bk-Natl Credit	PR	500.00
06/07/89 Western Union	PR	28.04
06/07/89 DHL Airways Inc.	PR	67.75
06/07/89 Brody & Weiss	PR	350.00
06/07/89 Burrelles Press Clip	PR	220.03
06/07/89 Federal Express Co	PR	167.00
06/07/89 H. Plotkin & Assoc.	PR	75.78
06/07/89 John Salayi-Mech.	PR	3,425.00
06/13/89 Copycare Printing	PR	270.51
06/22/89 SABRA	PR	263.22
06/28/89 Federal Express	PR	58.00
06/28/89 Gail Knopfler	PR	233.50
06/28/89 Manhattan Couriers	PR	11.50
06/28/89 UPS	PR	4.70
06/28/89 Manhattan Couriers	PR	41.75
07/05/89 MMBk Nat'l Cr Grp	PR	500.00
07/06/89 Copycare Printing Co.	PR	2,066.96
07/06/89 DHL Airways Inc.	PR	75.75
07/06/89 Federal Express Corp.	PR	103.25
07/06/89 Manhattan Couriers	PR	26.00
07/06/89 NY Athletic Club	PR	92.15
07/06/89 Olympic Courier	PR	33.00
07/06/89 UPS	PR	219.63
07/12/89 Bonnaire Care Rental	PR	273.22
07/12/89 Brody & Weiss	PR	350.00
07/12/89 Federal Express Corp.	PR	345.40
07/12/89 Islands Publishing Co.	PR	20.00
07/12/89 Luce Press Clipping	PR	974.06
07/12/89 Mkting Strategist	PR	105.00
07/12/89 J. Salayi/Mechanicals	PR	535.00
07/12/89 Proprint	PR	40.77
07/12/89 SABRA	PR	148.00
07/12/89 UPS	PR	14.96
07/12/89 City Collector	PR	1,295.00
07/12/89 NYS Corp Tax	PR	535.00
07/12/89 MMBk IRS Form 8109	PR	1,775.00

TOTAL

43,444.36

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Yvonne Nichie
Signature

August 18, 1989
Date

Yvonne Nichie

Please type or print name of signatory on the line above

President, Sontheimer Group
Title